

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RICHARD REID,
Plaintiff,

v.

DRIFTWOOD HOSPITALITY
MANAGEMENT II, LLC,
Defendant.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:20-CV-2581-B

**DEFENDANT’S SECOND SUPPLEMENT TO
NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant DRIFTWOOD HOSPITALITY MANAGEMENT II, LLC (“Driftwood Hospitality”) and files this Second Supplement to its Notice of Removal (Doc. 1) and in response to the court’s Second Order to Show Cause (Doc. 7), and would show the court the following:

E. DIVERSITY OF CITIZENSHIP

11. The district courts of the United States have original jurisdiction over this action pursuant to 28 U.S.C. § 1332:

- (a) **Plaintiff** is a citizen of the State of Texas (Doc. 1-1, Exh. C-1, p. 1).
- (b) **Defendant Driftwood Hospitality** is a limited liability company formed in the state of Delaware and has its principal place of business in Palm Beach County, Florida. Therefore, Driftwood Hospitality, is a citizen of the state of Florida.
- (c) **Defendant Driftwood Hospitality** is comprised of the following four members:
 - (i) **Driftwood Ventures, Inc.** is incorporated in the state of Florida and has its principal place of business in the state of Florida.
 - (ii) **Carlos J. Rodriguez, Inc.** is incorporated in the state of Florida and has its

principal place of business in the state of Florida.

- (iii) **Steve Johnson** is a citizen of the state of Arizona.
- (iv) **Driftwood Acquisition & Development, LP** is a limited partnership formed in the state of Delaware and has its principal place of business in the state of Florida [corrected] and is comprised of the following:
 - (A) General Partner: Red Dune Capital, LLC, a Delaware limited liability company with members David Buddemeyer and Carlos J. Rodriguez, both of which are citizens of the state of Florida.
 - (B) Limited Partner: Rafael Angel Calderon – Tennessee
 - (C) Limited Partner: Karla Calderon – Tennessee
 - (D) Limited Partner: Lynne Family Trust – New Jersey citizens
 - (E) Limited Partner: Jane M. Alderson - Tennessee
 - (F) Limited Partner: Stanly Wayne Demarcus, Jr. - Tennessee
 - (G) Limited Partner: Patrick Chummisky - Tennessee
 - (H) Limited Partner: Marco Calderon - Tennessee
 - (I) Limited Partner: Hotel Inv. DAD LLC – members are Florida citizens
 - (J) Limited Partner: Andina Hotels LLC – members are Florida citizens
 - (K) Limited Partner: Local Equity II Holding, LLC – members are Florida citizens
 - (L) Limited Partner: Funacion Alcla - Panama
 - (M) Limited Partner: Claudia Mugrabi - Florida
 - (N) Limited Partner: Milaine Mugrabi – New York
 - (O) Limited Partner: Pinecrest Windsor - Florida
 - (P) Limited Partner: Ivan Blinoff - Bermuda
 - (Q) Limited Partner: Colette T. Smith Revocable Trust - Florida

- (R) Limited Partner: Cathleen Fox - Florida
 - (S) Limited Partner: Sean Pool - Florida
 - (T) Limited Partner: Carlos J. Rodriguez Family, LLC – members
Carlos Rodriguez and Pamela Rodriguez are Florida citizens
 - (U) Limited Partner: Ven One Investment of Florida - New York
citizens
 - (V) Limited Partner: Terry S. Jove 2010 Irrevocable Trust - Florida
- (d) **Defendant Driftwood Hospitality** has the following three managers:
- (i) **David Buddemeyer** is a citizen of the state of Florida.
 - (ii) **Carlos J. Rodriguez** is a citizen of the state of Florida.
 - (iii) **Charles M. Diaz** is a citizen of the state of Florida.

Accordingly, there is complete diversity of citizenship between all parties plaintiff and all parties defendant; and, as first identified in the Original Petition, the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

F. DEFENDANT'S PRAYER

WHEREFORE PREMISES CONSIDERED, Defendant Driftwood Hospitality, pursuant to these statutes and in conformance with the requirements set forth in 28 U.S.C. § 1446, removes this action for trial from the 162nd District Court of Dallas County, Texas to the U.S. District Court for the Northern District of Texas, Dallas Division.

Respectfully submitted,

/s/ Michael C. Lawrence
MICHAEL C. LAWRENCE
SBN: 00784453
Law Offices of Gallerson & Yates
8070 Park Lane, Suite 200
Dallas, TX 75231
TEL: 469-242-8953
FAX: 855-614-6695
irvinglegalmail@libertymutual.com
michael0949.lawrence@libertymutual.com
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on this 16th day of September 2020 upon the following counsel of record:

T. Craig Sheils
Email: craig@sheilswinnubst.com
Lattice E. Andrews
Email: latrice@sheilswinnubst.com
Kimberly A. Quirk
Email: kimberly@sheilswinnubst.com
Sheils Winnubst, PC
1100 Atrium II
1701 N. Collins Boulevard
Richardson, Texas 75080
Attorneys for the Plaintiff

/s/ Michael C. Lawrence
MICHAEL C. LAWRENCE